

# EXHIBIT E

**DR. JEFFERY WEISMAN 9/13/2022**

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1 UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF MISSOURI  
3 EASTERN DIVISION  
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7 JEFFERY WEISMAN and STRATEGIC BIOMEDICAL, INC.  
8 vs.  
9 BARNES JEWISH-HOSPITAL, BJC HEALTHCARE, WASHINGTON  
UNIVERSITY, DR. ALEX EVERS, DR. RICHARD BENZINGER, and  
DR. THOMAS COX

10 Cause No. 4:19-cv-00075-JAR  
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16 VIDEOTAPED DEPOSITION OF DR. JEFFERY WEISMAN  
17 TAKEN ON BEHALF OF THE DEFENDANTS  
18 SEPTEMBER 13, 2022  
19  
20  
21  
22  
23  
24

25 (Starting time of deposition: 9:04 a.m.)

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1 indicated that your medical knowledge was less than  
2 your peers at LSU?

3 MR. ELSTER: Objection form. Speculation.

4 A. And I -- I -- I wouldn't agree with that  
5 for the following reason: The -- this -- this is  
6 looking at class rank based on taking tests and that's  
7 it.

8 At LSU, I was conducting research with  
9 almost every department chair from literally the chair  
10 of radiology, chair of surgery, the chair of oral  
11 surgery. My -- according to them, my medical  
12 knowledge was at the very top.

13 If it's a question of is my class rank 81  
14 out of 110 because I was doing other things than just  
15 studying to take a test, then that's true. My class  
16 rank is my class rank.

17 Q. (Mr. Sullivan) Okay.

18 A. But my -- my medical knowledge was  
19 appropriate.

20 (Defendant's Deposition Exhibit A6, E-mail  
21 1/25/18 AKT 6mth Results.)

22 Q. Let me hand you what's been marked as  
23 Exhibit A6.

24 A. Okay. And this was --

25 Q. What -- what is the AKT test?

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1           A.    So Richard Benzinger and Washington  
2   University, they have -- there's -- there's exams, I  
3   believe it stands for the anesthesia knowledge test,  
4   and it's an informal test that you can take to see  
5   what your knowledge is in relationship to peers or  
6   your other people in your program or nationwide, I  
7   believe.

8           Q.    So it's, like, an inner -- kind of inner  
9   hospital, inner program test, correct?

10          A.    That -- that is my understanding of it.

11          Q.    And that's -- and -- and it's -- and it's  
12   to determine the level of knowledge of trainees?

13          A.    That is correct.

14          Q.    Do you recall that you got a raw score of  
15   77 in a standard score of 309 on the PKT -- AKT. I'm  
16   sorry.

17          A.    Yes. I believe this is -- yes.

18          Q.    And if you look at page 2 on the -- the  
19   table, the standard score of 309, that would have put  
20   you in the bottom five percent, if you look at the  
21   table and the percentile, of those taking the test.

22          A.    Yes.

23          Q.    Okay.

24          A.    And let me just --

25          Q.    Thanks.